

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

VICTIM RIGHTS LAW CENTER, et al.,

Plaintiffs,

v.

MIGUEL ANGEL CARDONA, in his official capacity as Secretary of Education, et al.,

Case No. 1:20-cv-11104

Defendants,

and

STATE OF TEXAS,

[Proposed] Intervenor-Defendant.

TEXAS' MOTION TO INTERVENE AS DEFENDANT

Putative Intervenor-Defendant, the State of Texas, by and through the Attorney General of Texas, and pursuant to Federal Rule of Civil Procedure 24, moves to intervene as of right in the above-captioned action or, in the alternative, permissively. In support of this Motion, Texas relies on the following contemporaneously-filed documents:

1. Memorandum in Support of Texas' Motion to Intervene;
2. [Proposed] Intervenor-Defendant Texas' Answer; and
3. [Proposed] Order Granting Texas' Motion to Intervene.

For the reasons stated in this Motion and accompanying documents, Texas respectfully requests that the Court grant its Motion to Intervene.

Date: April 30, 2021

KEN PAXTON
Attorney General of Texas

BRENT WEBSTER
First Assistant Attorney General

Respectfully submitted.

PATRICK K. SWEETEN
Associate Deputy for Special Litigation

/s/ Kathleen T. Hunker
KATHLEEN T. HUNKER
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CERTIFICATE OF SERVICE

I, Kenneth B. Walton, hereby certify that on April 30, 2021, a true and correct copy of the within document was served on all parties via the Electronic Case Filing System.

/s/ Kenneth B. Walton
Kenneth B. Walton